

# COMPLAINT

(for filers who are prisoners without lawyers)

U.S. DISTRICT COURT  
EASTERN DISTRICT-WI  
FILED

2019 OCT 21 P 3 21

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

STEPHEN C. DRIES  
CLERK

(Full name of plaintiff(s))

D'ANGELO ROGERS

v.

Case Number:

**19-C-1542**

(Full name of defendant(s))

(to be supplied by Clerk of Court)

Beloit Police Department

Rock County JAIL

Rock County District Attorney's office

## A. PARTIES

1. Plaintiff is a citizen of WISCONSIN and is located at  
(State)

Dodge Correctional P.O. Box 700 Waupun WI 53963  
(Address of prison or jail)

(If more than one plaintiff is filing, use another piece of paper.)

2. Defendant Rock County District Attorney office  
(Name)

is (if a person or private corporation) a citizen of WISCONSIN  
(State, if known)

and (if a person) resides at Rock County  
(Address, if known)

and (if the defendant harmed you while doing the defendant's job)

worked for Rock County D.A. office, Rock County Sheriff's office, Beloit Police Dept.  
(Employer's name and address, if known)

(If you need to list more defendants, use another piece of paper.)

B. STATEMENT OF CLAIM

On the space provided on the following pages, tell:

1. Who violated your rights;
2. What each defendant did;
3. When they did it;
4. Where it happened; and
5. Why they did it, if you know.

Plaintiff N'Angelo Rogers is an inmate at Dodge Correctional Inst. in Waupun  
WI. On October 18<sup>th</sup> 2017 Rogers was arrested by the Beloit Police Dept and  
charged with Attempt Murder as party to a crime. Det. Davies of (BPD) was lead  
detective and provided no physical Evidence in the crime to charge Rogers.  
District Attorney Mary Brice and Asst District Anne Mack pursued these charges  
off of hear say which never implicated Rogers in a crime. Rogers professed his  
innocence with a claim of Black male by the victim who wanted \$500 because  
Rogers was friends with the suspected shooter. Phone Records that were established  
as not being Rogers were labeled illegally with his name and used in court  
and Revocation hearing. His cell was searched numerous times on request/s

by the D.A. which officers went through legal documents without Rogers approval or presence. On more than one occasion Rock county officers stuffed papers falsely involving Rogers in documents purported to be found in a hallway that Rogers had not occupied that day. This was done with malicious intent to secure a conviction for the state. Rogers was cleared of all charges in June of 2018. He was illegally detained from October 2017 to June 2018 for crimes that were proven he did not commit. He lost wages for a construction job paying \$45.00 an hour, Rogers is terrified of law enforcement which is hindering his probation and parole. He has absconded probation since the incident in question for fear that law enforcement will retaliate because of the dismissal of charges. He is seeking damages for all of the above.

C. JURISDICTION



I am suing for a violation of federal law under 28 U.S.C. § 1331.

OR



I am suing under state law. The state citizenship of the plaintiff(s) is (are) different from the state citizenship of every defendant, and the amount of money at stake in this case (not counting interest and costs) is \$\_\_\_\_\_.

D. RELIEF WANTED

Describe what you want the Court to do if you win your lawsuit. Examples may include an award of money or an order telling defendants to do something or to stop doing something.

I would like \$350,000 for lost wages pain and emotional stress and illegal arrest for 8 months, Future doctor bill payments ~~and~~ counseling and Therapy and I want Mary Brisco and Anne Nack to be disbarred for Malpractice along with disciplinary actions taken upon Sheriff Spoden who I wrote Grievances to about the Issue of document purported to be found in his jail, Detective Narres should be demoted if not fired for not gathering proper information and evidence to charge me and pay a substantial portion of the damages

E. JURY DEMAND

I want a jury to hear my case.

☒ - YES

☐ - NO

I declare under penalty of perjury that the foregoing is true and correct.

Complaint signed this 13 day of October 2019.

Respectfully Submitted,

Danylo Hayes  
Signature of Plaintiff

542600  
Plaintiff's Prisoner ID Number

Dodge Correctional Center  
P.O. Box 700 Waupun WI 53963  
(Mailing Address of Plaintiff)

(If more than one plaintiff, use another piece of paper.)

**REQUEST TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING THE FULL FILING FEE**



I DO request that I be allowed to file this complaint without paying the filing fee. I have completed a Request to Proceed in District Court without Prepaying the Full Filing Fee form and have attached it to the complaint.



I DO NOT request that I be allowed to file this complaint without prepaying the filing fee under 28 U.S.C. § 1915, and I have included the full filing fee with this complaint.